

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In re: BAIR HUGGER FORCED AIR
WARMING DEVICES PRODUCTS
LIABILITY LITIGATION

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:
All Cases

**PLAINTIFFS' MOTION TO
EXCLUDE THE TESTIMONY OF
JONATHAN B. BORAK**

Under Federal Rule of Evidence 702, Plaintiffs respectfully move this Court for an Order excluding the opinions and testimony of Jonathan B. Borak, M.D., because his methods, opinions, and testimony do not comport with the legal requirements of an expert witness. This motion is based on Plaintiffs' Memorandum of Law in Support of Motion to Exclude the Testimony of Jonathan B. Borak; the Declaration of Genevieve M. Zimmerman; the Exhibits herein; and argument to be presented at the hearing of this matter.

Dated: September 12, 2017

CIRESI CONLIN L.L.P.

/s/ Michael V. Ciresi

Michael V. Ciresi (MN #0016949)
Jan M. Conlin (MN #0192697)
Michael Sacchet (MN # 395817)
225 S. 6th St., Suite 4600
Minneapolis, MN 55402
Phone: 612.361.8202
Email: MVC@CiresiConlin.com

MESHBESHER & SPENCE LTD.

/s/ Genevieve M. Zimmerman

Genevieve M. Zimmerman (MN #330292)
1616 Park Avenue South
Minneapolis, MN 55404
Phone: (612) 339-9121
Email: gzimmerman@meshbeshesher.com

LEVIN PAPANTONIO, P.A.

/s/ Ben W. Gordon, Jr.

Ben W. Gordon (FL # 882836)

316 S. Baylen Street, Suite 600

Pensacola, FL 32502-5996

Email: bgordon@levinlaw.com

Plaintiffs' Co-Lead Counsel